

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

**BOSTON GAS COMPANY d/b/a KEYSPAN ENERGY  
DELIVERY NEW ENGLAND**

**D.T.E. 03-40**

ATTORNEY GENERAL'S TENTH SET OF  
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's Tenth Set of Document and Information Requests regarding the prefiled testimony of Mr. Orlando.

- AG-10-1 Please provide a complete copy of the AGA 2002 Non-Exempt Compensation Survey referred to in Exhibit KEDNE/JCO-7.
- AG-10-2 Referring to Exhibit KEDNE/JCO-7, please provide the names of the companies included in the Northeast Utility Data.
- AG-10-3 Referring to Exhibit KEDNE/JCO-7, please indicate the methodology used by the Company to determine the Survey Title categories to be included on that page.
- AG-10-4 Referring to Exhibit KEDNE/JCO-7, please provide the number of full-time Company employees at test year end in each of the Survey Title categories.
- AG-10-5 Please provide a complete copy of the AGA 2002 Compensation Survey referred to in Exhibit KEDNE/JCO-9, page 1.
- AG-10-6 Referring to the Source footnote on Exhibit KEDNE/JCO-9, page 1, please provide a complete and detailed description of the nature of any changes to the data associated with the aging of 3% to January 2003 referred to in that footnote. Please also provide any workpapers, calculations, formulas, assumption, and other supporting documentation for that aging.

- AG-10-7 Referring to Exhibit KEDNE/JCO-9, page 1, please indicate the methodology used by the Company to determine the Survey Position categories to be included on that page.
- AG-10-8 Please provide a complete copy of the William Mercer 2002 Compensation Survey referred to in Exhibit KEDNE/JCO-9, page 2.
- AG-10-9 Referring to the Source footnote on Exhibit KEDNE/JCO-9, page 2, please provide a complete and detailed description of the nature of any changes to the data associated with the aging of 2.5% to January 2003 referred to in that footnote. Please also provide any workpapers, calculations, formulas, assumption, and other supporting documentation for that aging.
- AG-10-10 Referring to Exhibit KEDNE/JCO-9, page 2, please indicate the methodology used by the Company to determine the Survey Position categories to be included on that page.
- AG-10-11 Please provide a complete copy of the AGA 2002 Compensation Survey referred to in Exhibit KEDNE/JCO-9, page 3.
- AG-10-12 Referring to the Source footnote on Exhibit KEDNE/JCO-9, page 3, please provide a complete and detailed description of the nature of any changes to the data associated with the aging of 3% to January 2003 referred to in that footnote. Please also provide any workpapers, calculations, formulas, assumption, and other supporting documentation for that aging.
- AG-10-13 Referring to Exhibit KEDNE/JCO-9, page 3, please indicate the methodology used by the Company to determine the Survey Position categories to be included on that page.
- AG-10-14 Please provide a complete copy of the William Mercer 2002 Compensation Survey referred to in Exhibit KEDNE/JCO-9, page 4.
- AG-10-15 Referring to the Source footnote on Exhibit KEDNE/JCO-9, page 4, please provide a complete and detailed description of the nature of any changes to the data associated with the aging of 2.5% to January 2003 referred to in that footnote. Please also provide any workpapers, calculations, formulas, assumption, and other supporting documentation for that aging.
- AG-10-16 Referring to Exhibit KEDNE/JCO-9, page 4, please indicate the methodology used by the Company to determine the Survey Position categories to be included on that page.

- AG-10-17 Referring to Exhibit KEDNE/JCO-10, please provide a complete copy of each of the William M. Mercer, Inc. surveys referred to on that page.
- AG-10-18 Referring to Exhibit KEDNE/JCO-10, please provide a complete copy of each of the Compensation Resources surveys referred to on that page.
- AG-10-19 Referring to Exhibit KEDNE/JCO-10, please provide a complete copy of each of the Hewitt Associates surveys referred to on that page.
- AG-10-20 Referring to Exhibit KEDNE/JCO-11, please provide a complete copy of each of the Towers Perrin surveys referred to on that page.
- AG-10-21 Referring to Exhibit KEDNE/JCO-11, please provide a complete copy of the workpapers, calculations, formulas, assumptions, and supporting documentation for the BENVAL actuarial tool analysis used by Towers Perrin for the benefit plan valuations referred to on that page.
- AG-10-22 Referring to Exhibit KEDNE/JCO-11, please provide a complete and detailed description of the term “energy services” as was used for the survey referred to on that page.
- AG-10-23 Referring to Exhibit KEDNE/JCO-11, please provide a list of the names of the companies that were included in the Survey Group to which Boston Gas Company’s benefits were compared.
- AG-10-24 Referring to Exhibit KEDNE/JCO-12, please provide the ratio of Total Benefits to Total Compensation expressed as a percent for each of the companies indicated on that page.
- AG-10-25 Referring to Exhibit KEDNE/JCO-13, please provide a complete copy of each of the Saratoga Institute study referred to on that page.
- AG-10-26 Referring to Exhibit KEDNE/JCO-1, page 5, lines 11-14, please provide a copy of the employee compensation plan that describes the KeySpan’s variable-pay structure as indicated on that page. Please also provide a complete and detailed description of the Company’s plans to move its employees to that pay structure.
- AG-10-27 Referring to Exhibit KEDNE/JCO-1, page 7, lines 12-17, please provide a copy of the workpapers, calculations, formulas, assumptions, and other supporting documentation for the one percent additional increase in pay for New York employees.

- AG-10-28 Please provide for each employee category (union, non-union, management, corporate officers, etc.) the following information for the test year:
- (1) the base pay expense;
  - (2) the variable pay expense;
  - (3) the merit pay expense; and
  - (4) the incentive pay expense.
- AG-10-29 Please provide a copy of the Company's Incentive Compensation plan. To the extent that the plan has not been formalized, please provide a complete and detailed description of the plan including the structure and targets for each category of employee.
- AG-10-30 Please provide the target and actual payouts under the Incentive Compensation plan for each of the last five years for each category of employee.
- AG-10-31 Please provide the target and actual payouts under the Merit Compensation plan for each of the last five years for each category of employee.
- AG-10-32 Referring to Exhibit KEDNE/JCO-1, page 10, lines 15-18, please provide a copy of all presentations, studies, analyses, e-mails and memos provided to the Board of Directors regarding the performance goals and pay-out scale during the last three years.
- AG-10-33 Referring to Exhibit KEDNE/JCO-1, page 11, lines 12-15, please provide a copy of the three-year transition plan that describes the standardization of the Incentive Plan for all KeySpan employees.
- AG-10-34 Referring to Exhibit KEDNE/JCO-1, page 12, lines 19-21, please provide a copy of the workpapers, calculations, formulas, assumptions, and other supporting documentation used to determine the estimate of the five percent reduction in the drug coverage costs.
- AG-10-35 Referring to Exhibit KEDNE/JCO-7, please breakout the salary information on that page for base, merit, incentive, and bonus pay amounts.

Dated: May 2, 2003.